

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
CHATTANOOGA DIVISION**

JEFF BANKER and SAMMYE  
BANKER,

Plaintiffs,

v.

FIFTY PLUS RACING  
FOUNDATION, INC., OLTHOFF  
RACING, INC., DENNIS OLTHOFF,  
JOHN DOE and JOHN DOE  
CORPORATION

Defendants.

Civil Action File No.  
1:20-CV-00228-DCLC-CHS

**PLAINTIFFS' IDENTIFICATION OF EXPERT**

COME NOW Jeff Banker and Sammye Banker and identifies the following experts pursuant to F.R.C.P. 26(a)(2)(C). Plaintiffs are providing a summary of the expected testimony of the expert.

Dr. John Sass is a neuropsychologist who performed cognitive testing on Mr. Banker and will testify concerning Mr. Banker's cognitive deficits based on the results of his testing and that these cognitive deficits are the result of the accident at issue in this litigation. Dr. Sass will also testify concerning Mr. Banker's future prognosis and that these cognitive deficits are likely permanent. Dr. Sass will also testify that Mr. Banker has suffered a traumatic brain injury as a

result of the incident and the treatment and care and coping mechanisms needed for Mr. Banker to deal with the brain injury. Dr. Sass will testify that the need for this future treatment and care is related to the incident at issue in this litigation. Dr. Sass may have other opinions that are contained in his report which is being produced. Plaintiffs have produced a copy of the curriculum vitae and list of cases in which Dr. Sass has testified to the Defendants.

This 13<sup>th</sup> day of January, 2021.

Respectfully Submitted,

**FRIED GOLDBERG LLC**

/s/ Michael L. Goldberg

**MICHAEL L. GOLDBERG**

Tennessee BPR No.: 035863

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing *PLAINTIFFS' IDENTIFICATION OF EXPERT* with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

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Dated on January 13, 2021.

**FRIED GOLDBERG LLC**

/s/ Michael L. Goldberg  
**MICHAEL L. GOLDBERG**  
Tennessee BPR No.: 035863